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June 6, 2025

VIA ECF

Judge Jesse M. Furman
United States District Court
Southern District of New York
40 Centre Street, Room 2202
New York, NY 10007

Re: Letter Motion Seeking Leave to Amend Complaint and to File Amended Complaint Under Seal in Joshua Pickar v. Indiana Federal Community Defenders, Inc. et al., No. 1:25-CV-01353-JMF.

Dear Judge Furman,

The undersigned counsel represents Plaintiff Joshua B. Pickar in the above-referenced matter. I am writing to seek leave to amend Plaintiff's Complaint and to file a copy of the Amended Complaint under seal, and subsequently submit for filing on the public docket a redacted version the Amended Complaint. Federal Rule of Civil Procedure 15(a)(1)(B) permits one amendment as a matter of course within 21 days "after service of a responsive pleading." Defendants' Answer was filed on May 19, 2025. Therefore, under the Federal Rules, Plaintiff can freely amend prior to June 9, 2025.

I respectfully request that this Court grant leave to file Plaintiff's Amended Complaint under seal. See Individual Rules & Practice in Civil Cases § 7. Along with the letter-motion, Counsel filed under seal a version of the Amended Complaint utilizing yellow highlights to more clearly indicate changes from the original compliant. See Individual Rules & Practice in Civil Cases § 1(B).

I also respectfully request that this Court grant leave to file a redacted version of the Amended Complaint on the public docket. Simultaneously with this filing, Counsel for Plaintiff has submitted to Counsel for Defendants a copy of paragraphs 207-228 with proposed redactions included for their consideration.

Thank you for your time and consideration.

Hon. Jesse M. Furman, U.S.D.J.

June 6, 2025

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Respectfully submitted,

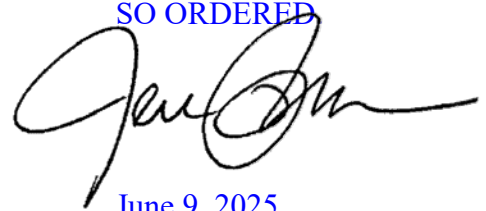
Paul A. Lieberman

Paul A. Lieberman (PL 5583)

Cc: Nicole Koumasidis, Esq. (Via ECF)

Application GRANTED. The Court finds the redactions are narrowly tailored to reasons that justify overcoming the presumption in favor of public access to judicial documents. The Clerk of Court is directed to file and maintain ECF No. 39 under seal and to terminate ECF No. 38.

SO ORDERED

A handwritten signature in black ink, appearing to read "Jesse M. Furman", is written over the typed name "Jesse M. Furman".

June 9, 2025